

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Administration of the)

North American Numbering Plan)

Carrier Identification Codes (CICs))

CC Docket No. 92-237

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REPLY

BellSouth Corporation,¹ on behalf of itself and its affiliated companies, by counsel, files its reply to the comments of IXC Long Distance, Inc. and Ameritech Corporation.

I. THE SWITCH SOFTWARE IMPACTS OF FOUR-DIGIT "RESELLER IDENTIFICATION CODES" NEED TO BE ASSESSED

IXC Long Distance, Inc. (IXCLD) states that the "use of four-digit RICs with CICs would be a valuable tool for CIC conservation."² IXCLD contends that "[b]y using four-digit RICs, which could be added to the underlying carrier's CIC, resellers would not need to obtain their own CICs to specifically identify their own services. RICs would thus allow resellers to accomplish their billing and name recognition goals, while decreasing the demand for CICs."³ However, the Reseller Identification Code (RIC) concept is not defined sufficiently by IXCLD to allow thorough analysis of the impacts of the use of RICs on other carriers or their networks.

¹ BellSouth Corporation (BSC) is a publicly traded Georgia corporation that holds the stock of companies which offer local telephone service, provide advertising and publishing services, market and maintain stand-alone and fully integrated communications systems, and provide mobile communications and other network services world-wide.

² IXCLD Comments at 8.

³ *Id.*

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BellSouth is unaware of any current capability in its own network or its network support systems to handle RICs. IXCLD's proposal appears to raise technical issues that would be better raised at or resolved by consensus in industry fora.⁴

II. THE CHILEAN CIC SYSTEM SHOULD NOT BE ADOPTED OVER THE CONSENSUS RECOMMENDATIONS OF NORTH AMERICAN CARRIERS

Based on its experience in Chile, Americatel advocates a CIC assignment system in which three-digit Feature Group D CICs are used only for customers to gain access to long distance carriers and for routing and billing of long distance traffic.⁵ What Americatel essentially seeks is that "elimination of three digit CICs should be delayed until [open] issues" are resolved.⁶ The proposal is contrary to the Commission's mandatory conversion to four-digit CICs, contrary to the North American Numbering Council's (NANC) recommendation, and contrary to the weight of the comments filed in this proceeding. All of these positions indicate that access uses of CICs should not be constrained.

The Commission recently reaffirmed that the public interest, and the pro-competitive policies underlying the Communications Act, as amended, would be served by moving to the use of only four-digit CICs as soon as possible.⁷ The Commission should therefore not address

⁴ Although the NANC Ad Hoc Working Group was able to reach a consensus position on many issues, BellSouth agrees with Ameritech that the Commission should in the future rely to the maximum extent possible on existing open industry forum process. Ameritech Comments at 3-4. The issues raised by IXCLD are more appropriate for these processes than for an ad hoc effort.

⁵ Americatel Comments at 6.

⁶ *Id.* at 7.

⁷ Administration of the North American Numbering Plan Carrier Identification Codes (CICs), *Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking*, 11 FCC Rcd 17876, 17892 (1997) (CIC Reconsideration Order) at ¶ 25.

Americatel's request to delay mandatory conversion to four-digit CICs in this proceeding as it appears to constitute an untimely petition for reconsideration of the CIC Reconsideration Order.⁸ The NANC recommended that use of CICs should not be constrained to a limited set of applications.⁹ This recommendation reflects a consensus "representing the views of all segments of the telecommunications industry (parties that are usually in significant disagreement over numbering policy issues)."¹⁰ Moreover, the NANC recommendation received strong support in the comments filed in this proceeding.¹¹ Americatel's proposal to limit the use of CICs more narrowly than the NANC recommendation should not be adopted.

Americatel's recounting of the history and state of long distance competition in Chile, where there was until recently a single provider, is inapposite to the state of long distance competition in the United States, where there are four major carriers and over six hundred additional competing carriers.¹² The analogies to other developing South and Central American markets, where three-digit CICs have yet to be introduced, are not apt to the United States, where competition has existed in the long distance market place amongst presubscribed and non-presubscribed carriers for over a decade. These conditions have mandated transition to four-digit

⁸ 47 C.F.R. §§ 1.4, 1.429(d).

⁹ *Report and Recommendations of the CIC Ad Hoc Working Group to the NANC Regarding Use and Assignment of Carrier Identification Codes (CICs)* (filed February 18, 1998) at ¶ 17.

¹⁰ MCI Comments at 3.

¹¹ AT&T Comments at 3-8; GTE Comments at 6; U S WEST Comments at 4 (formal Commission rules regarding CIC use other than those recommended by NANC are not required and would introduce inflexibility).

¹² Zolnierek & Rangos, *Long Distance Market Shares Fourth Quarter* (Industry Analysis Division, Common Carrier Bureau, Federal Communications Commission March 1998) at 4.

CICs. In any event, the best way to advance competition in the North American long distance marketplace is for this Commission to act speedily and favorably on petitions filed by regional Bell operating companies, such as BellSouth, to provide in-region, interLATA service.


CONCLUSION

For the foregoing reasons, the Commission should not adopt the proposals of IXC Long Distance and Americatel.

Respectfully submitted,

BELLSOUTH CORPORATION

By:

A handwritten signature in dark ink, appearing to read "M. Robert Sutherland", is written over a horizontal line.

M. Robert Sutherland
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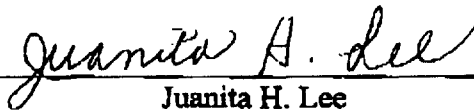
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CERTIFICATE OF SERVICE

I do hereby certify that I have, this 3rd day of April 1998, served all parties to this action with a copy of the foregoing **REPLY** by placing a true and correct copy of same in the United States Mail, postage prepaid, addressed to the parties listed on the attached service list.



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